

# Exhibit N

**Asher, Jennifer**

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**From:** Steinberg, Arthur  
**Sent:** Monday, September 28, 2015 10:48 AM  
**To:** Jim Butler; Asher, Jennifer  
**Cc:** Tedra Cannella; Bob Cheeley; Rob Snyder; bill@ballardandfeagle.com; Greg Feagle (greg@ballardandfeagle.com); Julie Houston; Cathy Huff; Feller, Leonid (leonid.feller@kirkland.com); Bloomer, Andrew B. (abloomer@kirkland.com); O'Reilly, Deirdre A. (doreilly@kirkland.com); Davidson, Scott  
**Subject:** RE: Fox vs. General Motors LLC, et al., Case No.: 14A 3468-4 (Cobb County, GA)); In re Motors Liquidation Company; Case No: 09-50026 -- Service of Other Plaintiffs' Complaints Letter, with Exhibits

I am responding to your questions. If the matter is still unclear, you can call me. 212 556 2158

The Bankruptcy Court entered a 6 page Scheduling Order dated September 3, 2015 which was sent to you by overnight mail and also emailed to you.

On page 4 of the Scheduling Order, the Bankruptcy Court directed New GM to send a copy of the Scheduling Order as well as a specific cover note to plaintiffs or their counsel who received demand letters (like yourself). You should review the Scheduling Order in general, and particularly the paragraph on page 4, and paragraphs on pages 5 and 6.

The procedures outlined in the Scheduling Order modified the procedures set forth in the Bankruptcy Court's June 1, 2015 Judgment which were set forth in demand letters.

Under the Scheduling Order, the Bankruptcy Court is deciding issues related to Punitive Damages, the Imputation Issue, Marked Pleadings in the Bellwether Complaints, States Complaints, Other Complaints, and the MDL Complaints. Everyone who got demand letters and the Scheduling Order will be bound by those determinations. There are Designated Counsel who have responded on behalf of plaintiffs. You are getting these pleadings so as to be fully informed as to what is going on. You are not compelled to respond to anything. Your clients and New GM will be bound by the Court's determination of issues decided pursuant to the Scheduling Order, which have relevance to the Fox litigation referenced above.

-----Original Message-----

From: Jim Butler [mailto:jim@butlerwooten.com]  
Sent: Saturday, September 26, 2015 8:44 AM  
To: Asher, Jennifer  
Cc: Tedra Cannella; Bob Cheeley; Rob Snyder; bill@ballardandfeagle.com; Greg Feagle (greg@ballardandfeagle.com); Julie Houston; Cathy Huff; Steinberg, Arthur; Feller, Leonid (leonid.feller@kirkland.com); Bloomer, Andrew B. (abloomer@kirkland.com); O'Reilly, Deirdre A. (doreilly@kirkland.com); Davidson, Scott  
Subject: Re: Fox vs. General Motors LLC, et al., Case No.: 14A 3468-4 (Cobb County, GA)); In re Motors Liquidation Company; Case No: 09-50026 -- Service of Other Plaintiffs' Complaints Letter, with Exhibits

To GM and GM lawyers:

Let us try again.

Is there something GM contends we must do as a result of receiving these emails? If so, what?

is there something GM contends we should - or could - do as a result of receiving these emails? If so, what?

Is GM trying to set up or create some argument that Ms. Fox has "waived" something if she or we do not do some thing as a result of receiving these emails? If so, what is the thing GM will or may argue has been "waived," and what is the basis for that argument?

Is GM sending us these emails because it contends it is compelled to do so due to some court's order? If so send that order, with the relevant provision highlighted.

Our apologies but we just do not have time just now to guess at the answers to the above questions, and since it is GM that is sending these emails, GM should be required to answer the questions and to thereby explain why it is sending us these emails.

Jim Butler

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> On Sep 25, 2015, at 12:56 PM, "Jim Butler" <jim@butlerwooten.com> wrote:

>

> Ms. Asher, i've been really busy with cases. Please explain why you want me or any of us to read this letter. Merely noting that we're involved in Fox v. GM is not an explanation.

>

> We're not involved in the case in which the letter was "filed."

>

> thank you.

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> if you are unwilling to explain fully why you send these emails to us, then kindly cease and desist from sending them.

>

> Jim Butler

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>> On Sep 23, 2015, at 3:09 PM, "Asher, Jennifer" <JAsher@kslaw.com> wrote:

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>> Counsel:

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>> Please see attached service copy of the Letter Filed on Behalf of General Motors LLC Regarding Other Plaintiffs' Complaints (with Exhibits) [Dkt. No. 13466], filed today, September 23, 2015, in the case captioned In re Motors Liquidation Company, Case No: 09-50026 (REG).

>>

>> You are receiving this service email in connection to your involvement as plaintiff's counsel in Fox vs. General Motors LLC, et al., Case No.: 14A 3468-4 (Cobb County, GA)).

>>

>> Thank you,

>> Jennifer Asher

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>> Jennifer A. Asher

>> King & Spalding LLP

>> 1185 Avenue of the Americas

>> New York, NY 10036

>> Phone: (212) 556-2196

>> Email: [jasher@kslaw.com](mailto:jasher@kslaw.com)<<mailto:jasher@kslaw.com>>

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>> King & Spalding Confidentiality Notice:

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>> <15 09 23 -13466 GM Ltr COURT Re Other Plaintiffs Complaints (w-EXs).pdf>